

3. The Complaint alleges that the plaintiff Phone.com, LLC is a Delaware limited liability company with a place of business in the state of Massachusetts; that plaintiff Escom, LLC is a Delaware limited liability company with a place of business in the State of California; that plaintiff Consultants.com, LLC is a Delaware limited liability company with a place of business in the state of Massachusetts; that plaintiff Love Tactics, LLC is a Delaware limited liability company with a place of business in the state of Massachusetts; that plaintiff Relationship.com, LLC is a Delaware limited liability company with a place of business in the state of Massachusetts; and that plaintiff Internet Real Estate Group, LLC is a Delaware limited liability company with a place of business in the state of Massachusetts. See Complaint at ¶¶ 7-12. For purposes of diversity jurisdiction, the plaintiffs are all deemed to be citizens of Delaware and Massachusetts or California. See 28 U.S.C. § 1332 (c) (1).

4. Defendant Sovereign is a federally-chartered savings association organized and existing under the laws of the United States. In accordance with 12 U.S.C. § 1464(x) (amended 2006), Sovereign is deemed to be a citizen only of the state in which it has its “home” office. Sovereign’s home office, as set forth in its articles of association, is located in Pennsylvania. For purposes of diversity jurisdiction under 28 U.S.C. § 1332, Sovereign is thus a citizen of the Commonwealth of Pennsylvania. See 12 U.S.C. § 1464(x).

5. The United States District Court for the District of Massachusetts has original jurisdiction over this action pursuant to 28 U.S.C. § 1332(a) because the dispute is between citizens of different states and the matter in controversy exceeds the sum or value of seventy-five thousand dollars (\$75,000).

6. A copy of all process and pleadings served upon Sovereign is being filed with this Notice of Removal and is attached hereto as Exhibit A.

7. Sovereign will provide written notice of the filing of this Notice of Removal as required by 28 U.S.C. § 1446(d), including filing a certified copy of this Notice of Removal with the clerk of the Superior Court of Suffolk County, Massachusetts.

SOVEREIGN BANK,

By its Attorneys,

/s/ J. Patrick Kennedy

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Dated: October 8, 2008

CERTIFICATE OF SERVICE

I, J. Patrick Kennedy, hereby certify that a true and correct copy of the foregoing Notice of Removal was served via first-class mail on this 8th day of October, 2008, upon the plaintiff's counsel of record as follows:

Geoffrey R. Bok, Esq.
Stoneman, Chandler & Miller LLP
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Boston, MA 02110

/s/ J. Patrick Kennedy

J. Patrick Kennedy

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